

FINDING OF NO SIGNIFICANT IMPACT

U.S. MARINE CORPS WAR MEMORIAL REHABILITATION GEORGE WASHINGTON MEMORIAL PARKWAY

The National Park Service proposes to rehabilitate the U.S. Marine Corps War Memorial on the George Washington Memorial Parkway. The major project components include rehabilitation of the base of the sculpture and upgrade of the lighting of the sculpture; rehabilitation of the memorial plaza, reviewing stand, and walkways; site improvements to the parade and memorial grounds; and upgrade of the existing electrical service and other site utilities.

The U.S. Marine Corps War Memorial stands for a symbol of this grateful Nation's esteem for the honored dead of the U.S. Marine Corps. The statue represents one of the most famous incidents of World War II, and the memorial is dedicated to all the Marines who have given their lives in the defense of the United States since 1775. The heroic bronze sculpture depicts the raising of the American flag over Mount Suribachi on the island of Iwo Jima by five marines and a Navy hospital corpsman. A Pulitzer Prize winning photograph by news photographer Joe Rosenthal inspired Sculptor Felix W. de Weldon to create a scale model and a life size model of the scene.

Erection of the memorial, which was designed by Horace W. Peaslee, began in September 1954. The memorial, standing 78 feet tall, was officially dedicated by President Dwight D. Eisenhower on November 10, 1954, the 179th anniversary of the U.S. Marine Corps. The memorial has a 10-foot tall base made of polished black Swedish granite. Mounted on the base are the 32-foot high figures shown erecting a 60-foot bronze flagpole. On the flagpole, a cloth flag flies 24 hours a day in accordance with a presidential proclamation. The exposed aggregate concrete panels, entry pathways, and reviewing stand represent the work of the John Joseph Earley Studios and have high artistic value because of the panels' unique texture, color, and pattern qualities. From an artistic standpoint, Earley's primary innovation was what he called "architectural" or "mosaic" concrete - created by using selected sizes and colors of aggregate in concrete and washing the surface of the concrete before it sets up in order to expose the aggregate.

The U.S. Marine Corps War Memorial serves an estimated 1.2 million visitors annually. The memorial provides a backdrop for military exercises from the adjacent field and reviewing stand area. The Marine Corps routinely uses the parade grounds for sunset parades and other events. The memorial and Arlington Ridge Park are also the focal location for the U.S. Marine Corps Marathon as well as a popular viewing area for the Fourth of July fireworks celebration.

PREFERRED ALTERNATIVE

Under the Preferred Alternative (Alternative C), the National Park Service will install new lighting to illuminate the sculpture, rehabilitate the plaza, reviewing stand, and walkways; implement site improvements to the parade and memorial grounds; and upgrade the existing electrical service and other site utilities. The rehabilitation will include full replacement (100 percent) of the concrete panels on the plaza.

To improve ventilation and safety of the monument's confined space, a passive ventilation system and an alternating tread ladder will be installed. Lighting components will be replaced to better illuminate the Iwo Jima sculpture. The concrete panels on the plaza will be removed and replaced. The reviewing stand will be rehabilitated in a similar manner as the plaza. The

rehabilitation will be conducted in a manner consistent with the *Secretary of Interior's Standards for the Treatment of Historic Properties*.

The National Park Service will replace the inadequate quick coupler irrigation system with a new automatic, zoned irrigation system. The parade grounds will be regraded to allow for better site drainage and minimize ponding. To increase visitor services, the National Park Service will install new site amenities (drinking fountains, seating, trash receptacles, and communications system). Missing or damaged trees and shrubs, new pine needle mulch in the pine tree area, and sod in areas within the limits of grading will be installed. The National Park Service will repair portions of the existing asphalt trails and install a new asphalt trail to connect North Meade Street to an existing trail to improve mobility and accessibility in accordance with the Americans with Disability Act (ADA) requirements. The new trail will require the construction of a small retaining wall to achieve the desire slope to make the trail ADA accessible. A new lighting system will be installed on the memorial grounds to vastly improve the quality, efficiency, and safety aspects of the general lighting plan.

To increase electrical power capacity to accommodate electrical needs during special events and to reduce the need for portable generators, the National Park Service will remove all the existing underground conduits, conductors and other distribution elements, and install new electrical load centers, associated conduit and feeder for power and lighting. A new site electrical main panel board will also be installed. In addition to upgrading the electrical system, the National Park Service will install a new water line for the new irrigation system and drinking fountains. To accommodate a future comfort station, a sewer line will be installed.

OTHER ALTERNATIVES CONSIDERED

The Environmental Assessment prepared for this project analyzed the No-Action Alternative, the Preferred Alternative (described above) and one other build alternative, Alternative B.

Under the No-Action Alternative, the National Park Service would conduct minimum concrete rehabilitation of the U.S. Marine Corps War Memorial. The National Park Service would leave all the concrete panels in place and make temporary repairs to the broken and/or displaced panels. The National Park Service would install mechanical exhaust for acceptable ventilation and code compliance. Also, there would be no changes to the current placement and type of lighting.

Under Alternative B, the National Park Service would rehabilitate the U.S. Marine Corps War Memorial as described for Alternative C except with only partial replacement (30 percent) of the concrete panels on the plaza.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969, which is guided by the Council on Environmental Quality. The Council on Environmental Quality provides direction that "[t]he environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of National Environmental Policy Act, which considers:

1. Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assuring for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;

3. Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserving important historic, cultural and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
6. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources (National Environmental Policy Act, section 101)."

The No-Action Alternative fails to meet all the criteria listed above. Implementation of the No-Action Alternative fails to preserve an important historic aspect of our national heritage (criterion 3), which in turn would not fulfill the National Park Service responsibilities to future generations as a trustee of the environment (criterion 1). The No-Action Alternative would not have the greatest beneficial uses without risk of health and safety (criterion 2). The No-Action Alternative does not achieve a balance between visitor and resource use at a high standard of living (criterion 5). Lastly, the No-Action Alternative does not enhance the quality of a renewable resource (criterion 6) such as the concrete on the plaza.

Alternative B and C have similar benefits and fulfill all the criteria above. Alternatives B and C both offer resource protection and preservation of our national heritage as described in Criterion 4; however, Alternative C offers a better long-term, sustainable solution because the full replacement of the concrete panels on the plaza corrects the underlying problems and would create a uniform surface. As a result, Alternative C is the environmentally preferred alternative.

MITIGATION MEASURES

Mitigation measures or conditions are presented as part of the Preferred Alternative and have been developed to lessen the adverse effects of the Preferred Alternative. The following mitigation measures are recommended for the implementation of the Preferred Alternative:

Section 106 Compliance. The rehabilitation of the U.S. Marine Corps War Memorial would be conducted in a manner that is consistent with the *Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating, Preserving, Restoring, and Reconstructing Historic Buildings* and the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. The Environmental Assessment was sent to the Virginia Department of Historic Resources for review. Additional information on archeological resources has also been sent to supplement the findings in the Environmental Assessment and the National Park Service will continue consultation if there are any deviation in design or newly discovered archeological material.

Archeological Investigation. A Phase I archeological survey was conducted along two utility corridors to the south of the memorial plaza, as there was an unknown potential for this area to contain archeological resources. Archeological testing included the placement of 4 shovel test pits along the proposed water line and 11 shovel test pits along the proposed sewer line. The testing was conducted by park archeologists, Brandon Bies and Matt Virta, between July 20th and July 26th, 2004. The field results identified a section of intact archeological resources along the central portion of the proposed sewer line. These consisted primarily of historic architectural artifacts dating from the post-Civil War period through the early 20th century, and were

concentrated at the crest of Arlington Ridge. Two intact archeological features were identified, and are most likely the remnants of farm houses or agricultural support structures that are known from historic maps to have existed in this location. Construction drawings for the sewer line have been annotated, and the sewer line will be adjusted so as to not disturb the known archeological resources. Instead, the line will be bored beneath the area known to contain sensitive resources. In addition, an archeologist will be present during all sewer line excavations in the event that an unanticipated archeological discovery is made. Any deviation from this plan or newly discovered archeological material will require additional consultation with the Virginia State Historic Preservation Officer. As these archeological remains are from an Anglo historic site, and no human remains, funerary objects, sacred objects, or objects of cultural patrimony were discovered during the survey, no tribal affiliates were consulted.

Use of Best Management Practices. Best Management Practices will be implemented by the contractor during construction. Soil compaction and disturbance will be kept to a minimal amount of space needed for construction activities. Appropriate sediment and erosion control measures (such as the installing silt fences and inlet protection) will be implemented to reduce soil erosion and runoff from the construction area. Disturbed soils will be revegetated based on the recommendations of the park staff and specified in the construction contract.

Notification of Construction and Memorial Grounds Closure. The National Park Service will notify the general public of the timeframe for construction and closure of the memorial and associated grounds. Notification will be accomplished through press releases, posting of information on the park's website and signs at the site. The National Park Service will also coordinate with the U.S. Marine Corps to assure that their staff has access to the memorial base to adhere to the presidential mandate to fly the flag at the U.S. Marine Corps War Memorial 24 hours a day, 7 days a week, and 365 days a year.

Timing of Construction. The timing of construction will occur to minimize impacts to the Marine Corps Marathon, sunset parades and the Independence Day celebration. To do this, the project construction could start in November 2004 (after the Marine Corps Birth Date November 10) with goal of completing construction before Marine Corps Marathon October 30, 2005. The rehabilitation of the parade grounds is postponed in construction specifications schedule for September-October, 2005 to accommodate Marine Corps rehearsal, parade and concert events in May- August.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an EIS: No major adverse or beneficial impacts were identified that would require analysis in an environmental impact statement.

The selected action (Preferred Alternative) will either have no or negligible impacts on water resources; coastal zone management; air quality; soundscape management; Indian Trust resources; ethnographic resources; topography, geology, and soils; agricultural lands, prime and unique farmlands; wildlife; rare, threatened, endangered, candidate species, and species of special concern; socio-economic environment; land use; environmental justice; community facilities and services; and infrastructure. There will be moderate, long-term, beneficial impacts on historic

structures/sites; aesthetics and visual resources; health and safety; and visitor use and experience. A minor, long-term, beneficial impact on park operations will occur. A minor, long-term, adverse impact will occur on the cultural landscape.

Moderate, short-term, adverse impacts to historic structures/sites, aesthetics and visual resources, and visitor use and experience will occur, and a minor, long-term adverse impact on lightscape management will occur.

Degree of effect on public health or safety: The combination of the replacement of the concrete panels, alterations to the ramps and walkways, installation of a new passive ventilation system, installation of new general site lighting and other enhanced site amenities will have a moderate, long-term, beneficial impact on health and safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. No unique prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas were identified during the preparation of the Environmental Assessment or during the public review period.

The project is located on the George Washington Memorial Parkway, which has both historic and cultural resources. The project area has a number of historic, commemorative, and cultural resources in the immediate vicinity such as the Arlington National Cemetery, Arlington House-the Robert E. Lee Memorial, Netherlands Carillon, Fort Myer Historic District, George Washington Memorial Parkway, Pentagon, Theodore Roosevelt Island, Arlington Memorial Bridge, Lincoln Memorial, Jefferson Memorial, Washington Monument, and a number of other commemorative sites located within these areas. The majority of these resources are listed on the National Register of Historic Places. Although not currently listed, the United States Marine Corps War Memorial and the Netherlands Carillon have been determined to be eligible for listing on the National Register of Historic Places. The proposed action does not diminish the eligibility of the Memorial or the Carillon for listing on the National Register.

Degree to which effects on the quality of the human environment are likely to be highly controversial: There were no highly controversial effects identified during the preparation of the Environmental Assessment or during the public review period.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: There were no highly uncertain, unique, or unknown risks identified during either preparation of the Environmental Assessment or during the public review period.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration: The Preferred Alternative neither establishes a National Park Service precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts: The proposed actions under the selected action (Preferred Alternative) are expected to have negligible and minor adverse impacts; overall, the net outcome will be a beneficial impact. When added to other past, present, and reasonably foreseeable projects, the Preferred Alternative will not result in individual insignificant impacts but cumulatively significant impacts.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: There are known historic resources near the project area and archeological resources located along the crest of Arlington Ridge running from just south of the Memorial Plaza towards the Netherlands Carillon. These remains will be avoided during construction by adjusting the path of the sewer line and direct boring beneath the sensitive archeological area. After applying the Advisory Council on Historic Preservation's Criteria of adverse effect (36 CFR 800.5), the National Park Service proposes that implementing the selected action will have no adverse effect on historic or archeological resources or any property that may meet National Register Criteria. The effect will not alter the memorial and its defining features to diminish the memorial's eligibility on the National Register of Historic Places. The National Park Service prepared an Assessment of Effect when alternative designs were formulated, and solicited comments and concurrence from the Virginia Department of Historic Resources. The concurrence from the VDHR is pending.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: No threatened, endangered, or candidate species of special concern are known to inhabit the project area or the general vicinity. Based on previous project correspondences for the project area, the U.S. Fish and Wildlife Service and Virginia Department of Conservation and Recreation have stated that no known rare species or species of concern, Federally-listed endangered and threatened species, wetlands or critical habitat are known to exist in the project area or are expected to be impacted by project activities.

Whether the action threatens a violation of federal, state, or local environmental protection law: The Preferred Alternative does not violate Federal, State or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

In addition to reviewing the list of significance criteria, the Superintendent has determined that implementation of the preferred alternative will not constitute an impairment of the park's resources or values. This conclusion is based on a thorough analysis of the impacts described in the Environmental Assessment, the agency and public comments received, and the professional judgment of the decisionmaker in accordance with the National Park Service's *Management Policies, 2001*. As described in the Environmental Assessment, implementation of the Preferred Alternative will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the George Washington Memorial Parkway, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning document.

PUBLIC INVOLVEMENT

The environmental assessment was made available for public review and comment from July 15, 2004, to August 20, 2004 (a period of 35 days). An electronic copy of the environmental assessment was placed on the park's website during the same period. The National Park Service also sent copies of the environmental assessment to various local organizations, interested parties, and government agencies for their review and comment. Agencies and organizations to which the Environmental Assessment was sent included but not limited to the Arlington County Planning Commission, Arlington County Board Of Supervisors, Arlington County Park and

Recreation Commission, Advisory Council on Historic Preservation, Arlington Historical Society, Virginia Department of Environmental Quality, Virginia Department of Historic Resources, Virginia Department of Transportation Northern Virginia District, Marine Corps Staff HQ Marine Corps, Fort Myer Army Military Base, Friends of Iwo Jima, and many nearby community, neighborhood, and business associations. Also, the Environmental Assessment was made available at the Arlington County Central Branch and Aurora Highlands Branch public libraries. Public notices of availability were posted in the Washington Post and Arlington Journal newspapers on July 23, 2004.

A letter dated August 25, 2004, was received from the Commonwealth of Virginia, Department of Environmental Quality. The department is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. Commenting State of Virginia agencies include Department of Conservation and Recreation, Department of Environmental Quality, Division of Water Quality, Department of Historic Resources, and the Northern Division of Regional Commission. No public letters or comments were received.

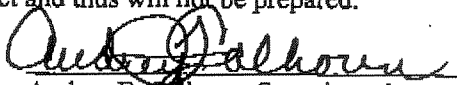
Responses to comments are presented in the attached NPS response "errata sheets" which amend the public review EA to reflect indicated changes. The entire public review EA is not reprinted. This FONSI and NPS responses, attached to the public review EA, present the NPS decision.

CONCLUSION

The proposed action (Preferred Alternative) does not constitute an action that normally requires preparation of an environmental impact statement. The proposed action (preferred alternative) will not have a major significant effect on the human environment. Adverse environmental impacts that could occur are negligible or minor in intensity. Mitigation measures will be incorporated into the proposed action (preferred alternative) to reduce or eliminate impacts. There are no significant adverse impacts on public health, public safety, threatened or endangered species, historic properties (either listed in or eligible for listing in the National Register of Historic Places) or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any Federal, State, or local environmental protection law. In general, the public supports the selected action and no substantive comments were received from the public or agencies.

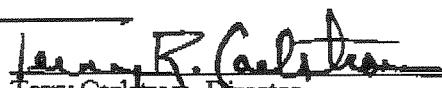
Based on the foregoing, it has been determined that an Environmental Impact Statement is not required for this project and thus will not be prepared.

Recommended:


Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway

9/10/2004
Date

Approved:


Terry Carlstrom, Director
National Capital Region, NPS

9/13/04
Date

ERRATA**Comments And Responses On The U.S. Marine Corps War Memorial Rehabilitation EA**

One letter of consolidation was received from The Commonwealth of Virginia in response to the public review EA. The letter with identified comments is duplicated in this "errata" and NPS responses are provided. The NPS responses amend the EA. The EA will not be reprinted. Please attach this FONSI and attachments to your copy of the EA. Together they present the NPS approved action.

NPS Responses to comments on Rehabilitate the U.S. Marine Corps War Memorial EA

1. **NPS Response:** During site investigation to gather information for the Treatment Plan and Design Services document (May 24, 2001), no hazardous materials (including asbestos and lead base paint) were encountered in the above ground structures. During construction, if hazardous materials are encountered in below ground material work will be halted in the discovery area and consultation initiated with the appropriate agencies to implement mitigation.
2. **NPS Response:** As stated on page 69 of the EA, the NPS will continue to consult with the Department of Historic Resources (the State Historic Preservation Office) pursuant to section 106 of the National Historic Preservation Act.
3. **NPS Response:** As stated on page 19 of the EA, the construction of this project would comply with State of Virginia sediment and erosion control practices. The NPS will secure all required permits prior to construction.
4. **NPS Response:** As stated on page 19 of the EA, the change to the existing memorial footprint and area of disturbance for the project would be less than 0.5 acre, and the total increase in impervious area would be negligible. Changes to the existing stormwater management practices on the memorial would not be required.
5. **NPS Response:** The Preferred Alternative on page 28 of the EA proposes no changes to the system of open space and connector trails in the area. All existing open space and trail within the project area would remain as presently exists. Temporary closures may be required during construction. If such temporary closures are required, appropriate signage would be installed well in advance of any such closures.
6. **NPS Response:** As stated on page 31 of the EA, the NPS has determined the project to be consistent with Virginia's Coastal Zone Management Program. The NPS will continue to consult with the Virginia Coastal Resources Management Program for written concurrence; such concurrence will be obtained prior to construction.

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COMMONWEALTH of VIRGINIA

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August 25, 2004

Ms. Audrey F. Calhoun
Superintendent, George Washington Memorial Parkway
National Park Service
Attn: U.S. Marine Corps War Memorial
Turkey Run Park
McLean, Virginia 22101

RE: Environmental Assessment on U.S. Marine Corps War Memorial Rehabilitation
DEQ-04-135F

Dear Ms. Calhoun:

The Commonwealth of Virginia has completed its review of the above-referenced Environmental Assessment (EA). The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The Department of Environmental Quality, as the lead agency for the Virginia Coastal Resources Management Program (VCP), is also responsible for coordinating the Commonwealth's review of federal consistency determinations submitted pursuant to the Coastal Zone Management Act (see "Federal Consistency..." below). The following agencies and regional planning district commission took part in this review:

Department of Environmental Quality (hereinafter "DEQ")
Department of Conservation and Recreation
Department of Historic Resources
Northern Virginia Regional Commission.

In addition, Arlington County was invited to comment.

Project Description

The National Park Service proposes to rehabilitate the U.S. Marine Corps War Memorial, located near the Arlington National Cemetery and Arlington Boulevard in Arlington, Virginia. The purpose of the project is to increase safety, enhance the visitor experience, protect park resources, provide handicapped access, and increase operational

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efficiency. The existing lighting needs repair, as do the plaza, approach walks, steps, pedestals, and reviewing stand. Three alternative courses of action are analyzed in the EA:

Alternative A, "no action," would continue present management. No major changes would be undertaken, and minimum rehabilitation would be undertaken, including mechanical exhaust ventilation for code compliance (page 21).

Alternative B, "memorial rehabilitation with partial replacement of concrete panels on plaza," would include four components (page 22):

- (1) rehabilitating the sculpture and memorial base;
- (2) rehabilitating the plaza, reviewing stand, and walkways;
- (3) making site improvements to the parade and memorial grounds; and
- (4) upgrading the existing electrical service and other utilities at the site.

Alternative C, "memorial rehabilitation with full replacement of concrete panels on plaza," is the preferred alternative. This would consist of the same components as Alternative B, except that all the concrete panels of the plaza would be replaced, with additional construction joints to minimize future deterioration (page 28). Alternatives B and C meet criteria for the "environmentally preferable alternative," but Alternative C is a more sustainable solution because of the full replacement of the concrete panels, and is considered environmentally preferable for this reason (page 30).

Environmental Impacts and Mitigation

1. Natural Heritage Resources. The Department of Conservation and Recreation (DCR) has searched its Biotics Data System for occurrences of natural heritage resources in the project area. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations. According to the data search, natural heritage resources are documented as present in the vicinity of the project. However, because of the scope of the project and the distance to the resources, DCR does not anticipate that the project will adversely affect natural heritage resources.

Under a memorandum of agreement between DCR and the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in commenting on project impacts on state-listed threatened and endangered plant and insect species. VDACS has regulatory authority to conserve rare, threatened, or endangered plant and insect species in Virginia. The proposed project will not affect any such species, according to DCR.

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The Department of Game and Inland Fisheries maintains a data base of wildlife locations, including trout streams, endangered and threatened species, and anadromous fish waters. This data base may contain information not documented by the Department of Conservation and Recreation. To find additional information not represented by the Department of Conservation and Recreation, the Park Service may contact the Department of Game and Inland Fisheries (Shirl Dresser, telephone (804) 367-6913) or look at the Department's web site:

http://www.dgif.virginia.gov/wildlife_info_map/index.html.

2. *Air Quality.* Arlington County is part of an ozone (O₃) non-attainment area. Accordingly, the Park Service should take all reasonable precautions to limit emissions of VOCs and NO_x, principally by controlling or limiting the burning of fossil fuels.

During rehabilitation activities, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

In addition, if project activities include the burning of construction or demolition material, this activity must meet the requirements of the Regulations for open burning (9 VAC 5-40-3600 et seq.), and it may require a permit (see "Regulatory and Coordination Needs," item 1, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Park Service should contact Arlington County officials, if burning is contemplated, to determine any local requirements. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building; unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;

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- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

3. *Water Quality.* DEQ's Division of Water Quality agrees with the conclusion that the Memorial rehabilitation repair project will not adversely affect surface waters or wetlands because there are none in the project vicinity (EA, pages 11-12). In the event the land disturbance associated with the project were to equal or exceed one acre, a Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities would be required; see "Regulatory and Coordination Needs," item 2, below.

DEQ's Division of Water Quality recommends strict adherence to erosion and sediment control requirements and stormwater management requirements (see item 6, below) and monitoring of construction activities to ensure that sediment and pollutants are effectively prevented from entering nearby waterways.

4. *Solid and Hazardous Waste Management.* According to DEQ's Waste Division, the EA addressed solid waste issues but not hazardous waste issues. DEQ's Waste Division did a cursory review of its data files, and determined that the Arlington National Cemetery, which is adjacent to the Memorial, is listed as a conditionally exempt small-quantity generator of hazardous waste (identification number VAD6210020032) pursuant to the Resource Conservation and Recovery Act (RCRA). The following web site may be helpful in locating additional information for this identification number:

http://www.epa.gov/echo/search_by_permit.html.

Hazardous waste generation should be minimized, and wastes handled appropriately. See "Regulatory and Coordination Needs," item 4, below.

DEQ's Waste Division recommends that the Memorial structure be checked for asbestos-containing materials and lead-based paint before rehabilitation efforts are undertaken. See "Regulatory and Coordination Needs," items 4(a) and 4(b), below.

DEQ's Waste Division also encourages the Park Service to implement pollution prevention principles, including the reduction of materials use at the source, re-use of materials, and recycling of waste materials. See also item 8, below.

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5. Historic Structures and Archaeological Resources. The Park Service is consulting with the Department of Historic Resources (the State Historic Preservation Office) pursuant to section 106 of the National Historic Preservation Act concerning this project. The Department of Historic Resources recommends that the consultation continue.

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6. Erosion and Sediment Control; Stormwater Management. The Department of Conservation and Recreation states that federal agencies conducting regulated land-disturbing activities must comply with the Virginia Erosion and Sediment Control Law (*Virginia Code* section 10.1-567) and its implementing regulations, and the Virginia Stormwater Management Law (*Virginia Code* section 10.1-603.15) and its implementing regulations, as well as with other applicable federal non-point source pollution control mandates (e.g., section 313 of the Clean Water Act, and federal consistency under the Coastal Zone Management Act).

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The following types of activities are regulated under the Erosion and Sediment Control Law if they will disturb 2,500 square feet or more of land area:

- clearing and grading activities;
- installation of staging areas, parking lots, roads, buildings, utilities, or other structures;
- soil/dredge spoil areas;
- related land conversion activities.

Please note that the 2,500-square foot land disturbance threshold applies in Chesapeake Bay Preservation Areas. See next item.

These same activities are regulated by the Stormwater Management Law if they will disturb one (1) acre or more of land area. The Park Service should prepare and implement Erosion and Sediment Control Plans and Stormwater Management Plans to ensure compliance with state law for this project. The Park Service is ultimately responsible for achieving compliance through oversight of contractors, regular field inspection, prompt action against non-compliance, and/or other mechanisms consistent with agency policy. See "Regulatory and Coordination Needs," item 3, below for information on compliance and technical assistance.

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7. Chesapeake Bay Preservation Areas. According to the Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance ("Division"), Arlington County has designated its entire jurisdiction a Chesapeake Bay Preservation Area under the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.). The proposed rehabilitation project appears to be outside of any Resource Protection Areas (the more stringent classification

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of Chesapeake Bay Preservation Areas), which means it is in a Resource Management Area (the less stringent classification, applicable to parts of the County that are not Resource Protection Areas). Accordingly, the project must be consistent with the performance standards in the Regulations, as implemented by Arlington County Ordinance, section 61-10. In addition, since the rehabilitation of the plaza, walkways, parade grounds, and memorial grounds will involve land disturbance exceeding 2,500 square feet, an Erosion and Sediment Control Plan will be necessary prior to any land disturbance; see preceding item.

8. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitments to the environment (such as an Environmental Management System) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into maintenance and operation, including inventory control (record-keeping and centralized storage for hazardous materials), among other things. Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides free information and technical assistance relating to pollution prevention techniques and Environmental Management Systems. If interested, the Park Service may contact that Office (Tom Griffin, telephone (804) 698-4545).

9. Recreation Resources. According to the Department of Conservation and Recreation (DCR), the project will not affect any state recreation resources, Natural Area Preserves, or scenic resources under the Department's jurisdiction. However, according

5

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Ms. Audrey F. Calhoun
Page 7

to DCR, the EA does not reflect that the Memorial location is an integral part of the system of open space and connector trails in the area. The Memorial is a key destination for pedestrians and bicyclists. DCR recommends that the Park Service consider maintaining and enhancing appropriate bicycling and walking access to the Memorial with signage upon completion of the rehabilitation project.

10. Local and Regional Comments. The Northern Virginia Regional Commission had no comment.

Federal Consistency under the Coastal Zone Management Act

Pursuant to the Coastal Zone Management Act of 1972, as amended, the Park Service is required to determine the consistency of its activities affecting Virginia's coastal resources or coastal uses with the federally approved Virginia Coastal Resources Management Program (VCP) (see section 307(c)(1) of the Act and 15 CFR Part 930, subpart C, section 930.34). This involves an analysis of the activities in light of the Enforceable Policies of the VCP (first enclosure), and submission of a consistency determination reflecting that analysis and committing the Park Service to comply with the Enforceable Policies. In addition, we invite your attention to the Advisory Policies of the VCP (second enclosure). The federal consistency determination may be provided as part of the documentation concluding the NEPA process, or independently, depending on your agency's preference. Section 930.39 gives content requirements for the consistency determination. The Park Service may contact DEQ's Office of Environmental Impact Review (Charles Ellis, telephone (804) 698-4488) to obtain additional information on consistency review.

Regulatory and Coordination Needs

1. Air Quality Regulation. In the event open burning of any debris is contemplated as part of this project, the Park Service should contact DEQ's Northern Virginia Regional Office (Mr. Terry Darton, telephone (703) 583-3845) to inquire about open burning permits. The same Office should be asked about permitting requirements that may apply to portable asphalt or cement mixers and other fuel-burning construction equipment used in the project.

2. Water Quality Regulation. If the total land disturbance equals one acre or more, a Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities will be required. Questions relative to this requirement may be addressed to DEQ's Northern Virginia Regional Office (John Bowden, telephone (703) 583-3880).

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Ms. Audrey F. Calhoun
Page 8

3. *Erosion and Sediment Control and Stormwater Management Plans.* The Department of Conservation and Recreation encourages the Park Service to contact the Department of Conservation and Recreation's Potomac Watershed Office in Warrenton (Shelby Hertzler, telephone (540) 351-1589) and/or Arlington County authorities to obtain plan development and implementation assistance and to ensure project compliance with the Erosion and Sediment Control Law (*Virginia Code* section 10.1-557). In addition, the *Virginia Erosion and Sediment Control Handbook*, available from the Watershed Office, gives guidance on this matter. The Watershed Office also administers the Stormwater Management Plan requirement pursuant to the Stormwater Management Law (*Virginia Code* section 10.1-603.15), if the requirement applies.

4. *Solid and Hazardous Waste Management.* Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (*Virginia Code* sections 10.1-1400 *et seq.*), the *Virginia Hazardous Waste Management Regulations* (9 VAC 20-50), and the *Virginia Solid Waste Management Regulations* (9 VAC 20-80); see the enclosed comments of DEQ's Waste Division (DEQ memo, Brockman to Ellis, dated August 17, 2004) for additional details.

As indicated above, DEQ's Waste Division recommends that the existing Memorial be checked for the presence of asbestos-containing materials and/or lead-based paint. The following guidance applies if either of these materials are found.

(a) *Asbestos Abatement.* It is the responsibility of the owner of a demolition or renovation project, prior to project commencement, to thoroughly inspect the affected part of the facility for the presence of asbestos, including Category I and Category II non-friable asbestos-containing material (ACM). Upon classification as friable or non-friable, all waste ACM must be disposed of in accordance with the *Virginia Solid Waste Management Regulations* (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing *Transportation of Hazardous Materials* (9 VAC 20-110-10 *et seq.*). The Park Service may contact the DEQ Waste Management Program (telephone (804) 698-4021) and the Department of Labor and Industry (Dr. Clarence Wheeling, telephone (804) 786-0574) for additional information.

(b) *Lead-Based Paint.* In addressing the presence of lead-based paint, the Park Service must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the *Virginia Lead-Based Paint Activities Rules and Regulations* (9 VAC 20-60-261). For additional information regarding these requirements, the Park Service may contact the Virginia Department of Professional and Occupational Regulation (Thomas Perry, telephone (804) 367-8595).

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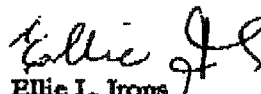
PAGE 10

Ms. Audrey F. Calhoun
Page 9

5. Historic Resources. To ensure compliance with section 106 of the National Historic Preservation Act, the Park Service should continue its consultation with the Department of Historic Resources (Marc Holma, telephone (804) 367-2323, extension 114) regarding this project.

Thank you for the opportunity to review this EA. If you have any questions about these comments, please feel free to call me (telephone (804) 698-4325) or Charlie Ellis of this Office (telephone (804) 698-4488).

Sincerely,



Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures

cc: John R. Davy, DCR
Shirl Dresser, DGIF
Allen Brockman, DEQ-Waste
Ellen Gilinsky, DEQ-DWQ
John D. Bowden, DEQ-NVRO
Kotur S. Narasimhan, DEQ-Air
Marc E. Holma, DHR
Alice R. T. Baird, DCR-DCBLA
G. Mark Gibb, NVRC
Ron Carlee, Arlington County

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PAGE 11

W. Tayloe Murphy, Jr.
Secretary of Natural
Resources



Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

900 Governor Street
Richmond, Virginia 23219-2010
(804) 746-6124

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AUG 28 2004

**DEQ Office of Environmental
Impact Review**

MEMORANDUM

Date: 19 August 2004
To: Charles H. Ellis, III, Virginia Department of Environmental Quality
From: John R. Davy, Director, Planning & Recreation Resources
Subject: DEQ#04-135F: U. S. Marine Corps War Memorial Rehabilitation

The Department of Conservation and Recreation (DCR) functions to preserve and protect the environment of the Commonwealth of Virginia and advocate the wise use of its scenic, cultural, recreation and natural heritage resources. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, state unique or exemplary natural communities, significant geologic formations and similar features of scientific interest.

DCR has searched its Biotics data system for occurrences of natural heritage resources in the project area. Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources we do not anticipate that this project will adversely impact these natural heritage resources.

Under the Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Department of Conservation and Recreation (DCR), DCR has the authority to report for VDACS on state-listed plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

In addition, The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous

*State Parks • Soil and Water Conservation • Natural Heritage • Outdoor Recreation Planning
Chesapeake Bay Local Assistance • Dam Safety and Floodplain Management • Land Conservation*

fish waters, that may contain information not documented in this letter. Their database may be accessed from http://www.deif.virginia.gov/wildlife/info_map/index.html, or contact Shirl Dressler at (804) 367-6913.

Please note that federal agencies and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, the sponsoring federal agency should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The sponsoring federal agency is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. The National Park Service is highly encouraged to contact DCR's Potomac Watershed Office (540.347.6420) and/or the local ESC and SWM authorities to obtain plan development, implementation assistance and to ensure project conformance during and after active construction. [Reference: VESCL §10.1-567; VSWML §10.1-603.15] Also, DCR's Chesapeake Bay Local Assistance Division is reviewing this project and will submit any comments they may, directly to you.

For your records, no state scenic resources, no state recreation resources and no natural area preserves under DCR's jurisdiction will be impacted by this project. However, the Environmental Assessment does not seem to capture that the War Memorial location is an integral part of the system of open-space and connector trails in the area. The site will be a key destination for pedestrian and cyclist. Consideration should be given to maintaining and enhancing appropriate walking and bicycling access with signage upon completion of the project.

Thank you for the opportunity to offer comments on this project.

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Aug-28-2004 09:04am From:DEQ

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.state.va.us

W. Taylor Murphy, Jr.
Secretary of Natural Resources

Robert G. Burnley
Director

(804) 691-4000
1-800-592-5482

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AUG 17 2004

DEQ-Office of Environmental
Impact Review

MEMORANDUM

TO: Charles H. Ellis, III, Environmental Program Planner

FROM: *ARB* Allen Brookman, Waste Division Environmental Review Coordinator

DATE: August 17, 2004

COPIES: Sanjay Thirunagari, Waste Division Environmental Review Manager; file

SUBJECT: Environmental Assessment
DOL/NPS—U.S. Marine Corps War Memorial Rehabilitation, Arlington, VA
DEQ Project #04-135F

The Waste Division has completed its review of the Environmental Impact report for the rehabilitation of the NPS's U.S. Marine Corps War Memorial in Arlington, Virginia. We have the following comments concerning the waste issues associated with this project:

Solid waste issues were addressed to some extent in the report. However, the report did not include a search of waste-related data bases and hazardous waste issues were not addressed. The Waste Division staff performed a cursory review of its data files and determined that adjacent Arlington National Cemetery is listed as a RCRA conditionally exempt small quantity generator of hazardous waste (VAD6210020032). The following website may prove helpful in locating additional information for this identification number:
http://www.epa.gov/echo/search_by_permit.html.

Any soil that is suspected of contamination or wastes that are generated during installation of lighting or ADA accessible ramps & walkways or the new irrigation system must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Parts 107.

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Also, any structures that may be rehabilitated/renovated should be checked for asbestos-containing materials (ACM) and lead-based paint prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-80-261 for LBP must be followed.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Allen Brockman at (804) 698-4468.

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Aug-28-2004 03:08pm From-DEQ

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MEMORANDUM


VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY
Larry G. Lawson, P.E., Director

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AUG 11 2004

LEQ-Office of Environmental
Impact Review

TO: Charles H. Ellis, III
Office of Environmental Impact Review

FROM: Michelle Henrich 
For: Ellen Gilinsky, Ph.D., PWS
Office of Wetlands and Water Protection and Compliance

DATE: August 9, 2004

SUBJECT: Environmental Assessment
U.S. Marine Corps War Memorial Rehabilitation
04-135F

We have reviewed the information provided concerning the above-referenced project. The purpose of the project consists of rehabilitating the sculpture and memorial base, rehabilitating the plaza, reviewing stand, and walkways, site improvements to the parade and memorial grounds; and upgrading the existing electrical service and other site utilities. The report concludes, and we concur, that there will be no adverse effects on surface water, wetland, or groundwater resources. According to the report, the project area does not contain wetlands, streams, or other surface water features.

Should the size or scope of the project change, additional review may be necessary. We recommend strict adherence to erosion and stormwater management practices, and further encourage the project proponent to monitor construction activities to make certain that erosion and stormwater management practices are adequately preventing sediment and pollutant migration into adjacent surface waters, including wetlands. A VPDES stormwater general permit for construction activities will be required should the project disturb one or more acres of land.

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PAGE 16

PAGE 18

Ellis, Charles

From: Bowden, John
Sent: Wednesday, August 04, 2004 9:34 AM
To: Ellis, Charles
Subject: EA #04-135F

NVRO comments regarding the U. S. Marine Corps War Memorial Rehabilitation project submitted by DOI/National Park Service are as follows:

1. There appears to be no adverse impact to the environment as evidenced by the submitted documents. They also indicate intended compliance with all environmental laws and regulations.

John D. Bowden
Deputy Regional Director
Department of Environmental Quality
Northern Virginia Regional Office
(703) 583-3886
jdbowden@deq.virginia.gov

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Aug-25-2004 03:03pm From:PER

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AUG 24 2004

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

W. Taylor Murphy, Jr.
Secretary of Natural Resources

Matthew S. Kilpatrick
Director

Tel: (804) 367-2222
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.state.va.us

August 20, 2004

Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: U.S. Marine Corps War Memorial Rehabilitation
DHR file no. 2004-1108

Dear Mr. Ellis,

Thank you for providing the Department of Historic Resources with an opportunity to comment on the above referenced project. The National Park Service is currently consulting with DHR about the Memorial rehabilitation project pursuant to Section 106 of the National Historic Preservation Act. We request that DEQ condition its approval of the project on the National Park Service's continued consultation with DHR.

Sincerely,

Marc Holma, Architectural Historian
Office of Review and Compliance

Administrative Services
18 Courthouse Avenue
Petersburg, VA 23103
Tel: (804) 363-3024
Fax: (804) 363-4136

Capital Region Office
2801 Kensington Ave.
Richmond, VA 23221
Tel: (804) 367-2222
Fax: (804) 367-2391

Portsmouth Region Office
615 Court Street, 3rd Floor
Portsmouth, VA 23704
Tel: (757) 396-6781
Fax: (757) 396-6712

Hampton Region Office
1030 Fawcett Ave., SE
Roanoke, VA 24018
Tel: (540) 853-7855
Fax: (540) 853-7858

Winchester Region Office
107 N. West Street, Suite 202
Winchester, VA 23391
Tel: (540) 722-3437
Fax: (540) 722-7855

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Aug-25-2004 03:08pm From:DCR

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W. Taylor Murphy, Jr.
Secretary of Natural
Resources

Joseph H. Maroon
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

101 N. 14th Street, 17th Floor
Richmond, Virginia 23219-3684
PHONE: (804) 225-3440 FAX: (804) 225-3447

August 24, 2004

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 east Main Street, Sixth Floor
Richmond, VA 23219

RE: U. S. Marine Corps War Memorial Rehabilitation
DEQ Project # 04-135F
DCBLAD Project # FSPR-NPS-05-04 US Marine Corps War Memorial Rehab

Dear Mr. Ellis,

We have reviewed the Environmental Assessment for the proposed U. S. Marine Corps War Memorial Rehabilitation. While the proposed rehabilitation project appears to be outside of any Resource Protection Area, as designated by Arlington County, the county has designated its entire jurisdiction a Chesapeake Bay Resource Management Area. Therefore, the National Park Service must ensure that the project is consistent with the performance standards of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations) as implemented by Arlington County Ordinance Section 61-10.

Additionally, since rehabilitation of the plaza, walkways, parade and memorial grounds will exceed 2500 square feet of land disturbance, an erosion and sediment control plan is required prior to disturbance in accordance with the Virginia Erosion and Sediment Control Handbook Third Edition, 1992.

We appreciate the opportunity to provide comments on this project. Please do not hesitate to contact us at 1-800-CHESBAY should you have any questions.

Sincerely,

Alice R. T. Baird
Senior Environmental Specialist

Heather C. A. Moskey
Principal Environmental Planner

08/28/2004 06:50 7032892598
Aug-25-2004 03:08pm From-DEQ

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PAGE 19
F-View Mail F-611

7535 Little River Turnpike, Suite 100
Annandale, Virginia 22003-2937
www.hovaregion.org

Voice: 703-642-0700
Fax: 703-642-5077
TDD: 703-642-8061



Northern Virginia Regional Commission

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July 28, 2004

JUL 29 2004

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Impact Review

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Vice-Chairman
Hon. Barbara A. Fawcett
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Hon. Gerald E. Connolly
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Town of Leesburg
Hon. Kristen C. Urnsford

Town of Potomacville
Hon. William T. Drufey, Jr.

Town of Vienna
(vacancy)

(cc of June 28, 2004)

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Re: U.S. Marine Corps War Memorial Rehabilitation

Dear Mr. Ellis:

The Northern Virginia Regional Commission staff has reviewed the application described above and has no comment on the proposal.

Thank you for this opportunity to participate in the intergovernmental review process.

Sincerely,

Katherine K. Mull

Katherine K. Mull
Senior Environmental Planner

Project: Project No. 04-135F
Sponsor: DOI/National Park Service

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Aug-28-2004 11:06am From:DEG

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P.002/002

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F-221

Ellis,Charles

From: Frank Shafroth (Fshafroth@arlingtonva.us)
Sent: Wednesday, August 25, 2004 4:40 PM
To: Ellis,Charles
Subject: Arlington's Comments on EA for Marine Corps War Memorial Rehabilitation (DEQ-04-135F)
Importance: High

Charlie Ellis
DEQ-OEIR

Subject: Comments on EA for Marine Corps War Memorial Rehabilitation (DEQ-04-135F)

After review, Arlington does not have any issues to raise with regard to the Marine Corps Memorial EA.

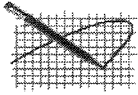
Thank you,

Frank Shafroth

From: Ellis,Charles (mailto:chellis@deq.virginia.gov)
Sent: Thursday, August 19, 2004 2:00 PM
To: jdevy@dc.virginia.gov; swaymack@dc.virginia.gov; charold@dc.virginia.gov; Ron Carlee
Subject: Comments on EA for Marine Corps War Memorial Rehabilitation (DEQ-04-135F)

Everybody - I need your comments on this Park Service environmental assessment when you get a chance. Thanks very much.

August 19



Richard Crane
09/13/2004 12:01 PM
MDT

To: Hugh Duffy
cc:
Subject: Fw: Visitor Transportation Study - What's New

FYI

Richard P. Crane

Project Manager • Denver Service Center • 303-969-2328 • Fax: 303-969-2238
----- Forwarded by Richard Crane/DENVER/NPS on 09/13/2004 12:01 PM -----



Alexa Viets
09/10/2004 11:22 AM
EDT

To: Vikki Keys/NACC/NPS@NPS, Adrienne
Applewhaite-Coleman/ROCR/NPS@NPS, Audrey
Calhoun/GWMP/NPS@NPS, Gayle Hazelwood/NACE/NPS@NPS,
Kevin Brandt/CHOH/NPS@NPS, Ann Bowman Smith/NCR/NPS@NPS
cc: Bob Karotko/NACC/NPS@NPS, Karen Cucurullo/NACC/NPS@NPS,
Steve Lorenzetti/NACC/NPS@NPS, Sean
Kennealy/NACC/NPS@NPS, Rick Merryman/NCR/NPS@NPS,
William Line/NCR/NPS@NPS, Connie Joy/NACC/NPS@NPS, Anne
Dayton/GWMP/NPS@NPS, Cindy Cox/ROCR/NPS@NPS, Laura
Illige/ROCR/NPS@NPS, Kathy Kupper/CHOH/NPS@NPS, Rachel
Frantum/WHVIS/NPS@NPS, Vicky Gammon/NCR/NPS@NPS, Steve
LeBel/NCR/NPS@NPS, Susan Hinton/NCR/NPS@NPS, Patrick
Gregerson/NCR/NPS@NPS, Susan Spain/DENVER/NPS@NPS,
Richard Crane/DENVER/NPS@NPS

Subject: Visitor Transportation Study - What's New

Transportation Alternatives Published for Public Comment

Nearly 1,000 newsletters were mailed out this week to announce the six (6) preliminary alternatives for public consideration and comment. The project website, as well as the NPS Alternative Transportation Program website, have been updated to include the latest newsletter and provide on-line avenues for public comment. Attached for your reference is a .pdf copy of the newsletter; hard copies will be mailed to each park as well.

Thank you for all the feedback provided to the team on both the alternatives and the newsletter!
Alexa

Project Website
<http://www.planning.nps.gov/parkweb/default.cfm?RecordID=167>

ATP Website
<http://www.nps.gov/transportation/alt/planning.htm>



NL 2 Final 8_30_04.pdf

Alexa C. Viets, AICP
Transportation Analyst
National Park Service
(202) 485-9877